

BEFORE THE
UNITED STATES DEPARTMENT OF TRANSPORTATION
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION

DOCKET NO. FMCSA-02-11650 (HM-232A)

HAZARDOUS MATERIAL SECURITY REQUIREMENTS FOR MOTOR CARRIER TRANSPORTING HAZARDOUS MATERIALS

COMMENTS OF

THE DOW CHEMICAL COMPANY

WEDNESDAY, SEPTEMBER 11, 2002

INTRODUCTION

~~TO THE PUBLIC, IT IS THE POLICY OF THE DEPARTMENT OF TRANSPORTATION TO MAKE AVAILABLE TO THE PUBLIC ALL INFORMATION THAT IS NOT EXEMPTED FROM DISCLOSURE UNDER THE FREEDOM OF INFORMATION ACT (5 U.S.C. 552).~~

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Dow appreciates the opportunity to participate in the rulemaking process and provide comments on the proposed rule.

ISSUES

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GPS tracking and other security measures have been widely implemented. GPS tracking is a good way to track the movement of vehicles and equipment. It can be used to track the location of vehicles and equipment at any time. It can also be used to track the speed of vehicles and equipment. This can be useful for identifying and preventing theft. Other security measures include the use of locks, alarms, and cameras. These measures can help to prevent theft and damage to equipment.

2. What is the effectiveness of different types of physical security measures?

The effectiveness of physical security measures varies depending on the method chosen.

- Sealing Column Locking Devices - Deters theft by making it difficult to remove the column locking device. It can be used to secure the column locking device and prevent it from being removed.
- Keyed Seals - Deters theft by making it difficult to remove the keyed seal. It can be used to secure the keyed seal and prevent it from being removed.
- Air brake locks - Deters theft by making release of brakes impossible.
- Cable seals - Deters easy access but can be cut.
- GPS Tracking - Provides real-time location and speed data. It can be used to track the location of vehicles and equipment at any time. It can also be used to track the speed of vehicles and equipment. This can be useful for identifying and preventing theft.
- Tractor Access Control - Restricts access to the tractor. It can be used to prevent unauthorized access to the tractor.
- Locking Devices - Deters theft by making it difficult to remove the locking device. It can be used to secure the locking device and prevent it from being removed.

3. What is the overall security of safe havens for temporary storage during transportation, including suggestions for improving security at safe havens or

4. What are some ways to improve security measures? Consider ways to improve security measures at safe havens or

SECURITY ITEM	DESCRIPTION	IMPACT	COST
Tractor Access Control by Mag Tec	Seals the tractor access point	Deters theft by making it difficult to remove the seal	Approximately \$40 per unit
Tractor Access Control by Bas Eng	Seals the tractor access point	Deters theft by making it difficult to remove the seal	Approximately \$40 per unit
Satellite Tracking on Tractors	Sends location and speed data to a central base	Provides real-time location and speed data	Refers to the cost of the equipment
Satellite Tracking Upgrades	Adds additional tracking features	Provides additional tracking features	\$35-\$50 per unit of upgrade
Sealing Column Locking Devices	Restricts access to the column locking device	Deters theft by making it difficult to remove the device	Approximately \$15 per unit
Anti-Theft Devices for Tractors	Keeps the tractor from being stolen	Deters theft by making it difficult to remove the device	Up to \$200 per unit.

Global Positioning Devices	High-precision GPS systems	Shimadzu GPS-M6000 High-Accuracy Receiver	Approximately \$400 per unit
Mechanical Sealing Cargos Tanks	Advanced mechanical seals for cargo tanks	Alfa Romeo Industrial Machinery Division	Costs vary up to \$1000 per seal
Advanced Cargo Sealing Devices	Cargo Protection by Sealflex	Depot Technology Inc. High-Tech Sealing Unit	Approximately \$500 per unit

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The Dow Chemical Company is a provider of RPA and MCS software for the process ANRM. Kobayashi, S. and others in Japan are also developing

Respectfully submitted,

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September 11, 2002

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